

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: AMBRO JOHNSON, SR.

Debtor

**OneMain Consumer Loan, Inc., as Servicer
for SpringCastle Finance Funding Trust**

Movant

v.

Ambro Johnson, Sr.

Respondent

**BANKRUPTCY CASE
NO.: 17-22820-glt**

CHAPTER 13

**OBJECTION OF ONEMAIN CONSUMER LOAN INC. et al, TO DEBTOR'S CHAPTER
13 PLAN**

OneMain Consumer Loan, Inc., as Servicer for SpringCastle Finance Funding Trust ("OneMain"), by its counsel, hereby objects to the confirmation of the Debtor's Plan for the following reason(s):

1. OneMain has a mortgage lien on property located at 1112 Pennsylvania Avenue, Pittsburgh, PA 15233 (the "Property"), based on a mortgage executed by the Debtor (the "Mortgage") which secures a loan made to the Debtor pursuant to a Home Equity Credit Line Revolving Loan Agreement (the "Agreement").
2. OneMain filed a secured Proof of Claim in the amount of \$5179.59 (Claim 4), in connection with the obligation of the Debtor under the above-referenced Agreement and Mortgage.
3. The Debtor's Schedules do not acknowledge the claim of OneMain with respect to the above Agreement and Mortgage, and the Debtor's Plan makes no provision for payment to OneMain with respect to the above Agreement and Mortgage.

WHEREFORE, OneMain alleges and avers that Debtor's plan is nonconfirmable because it does not make any provision for payment of secured Proof of Claim #4 filed by OneMain and therefore prays that this Honorable Court will:

- a. Deny confirmation of the Debtor's plan.
- b. Dismiss or convert Debtor's case.
- c. Provide such other relief as is equitable and just.

**WEBER GALLAGHER SIMPSON
STAPLETON FIRES & NEWBY, LLP**

Dated: August 23, 2017

/s/ Peter E. Meltzer
By: _____
PETER E. MELTZER, ESQUIRE

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CERTIFICATE OF SERVICE

(Objection of OneMain Consumer Loan Inc., et al. to Debtor's Chapter 13 Plan)

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on August 25, 2017.

The types of service made on the parties were by first class mail and electronic notification.

Service by First-Class Mail and Electronic Notification

Ambro Johnson, Sr.
1112 Pennsylvania Avenue
Pittsburgh, PA 15233

Ronda J. Winnecour, Trustee
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Service by First-Class Mail

Kenneth Steidl
Steidl & Steinberg
Suite 2830 Gulf Tower, 707 Grant Street
Pittsburgh, PA 15219

U.S. Trustee
Office of the United States Trustee
Liberty Center, Suite 970
1001 Liberty Avenue
Pittsburgh, PA 15222

**WEBER GALLAGHER SIMPSON
STAPLETON FIRES & NEWBY LLP**

/s/ Peter E. Meltzer

Peter E. Meltzer, Esquire, Attorney for Movant
Weber Gallagher, et al.,
2000 Market Street, 13th Floor,
Philadelphia, PA 19103
Ph: 267-295-3363
Identification No.: 39828, PA

Executed on: August 25, 2017